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7 Attorney for Albert Raul Franco

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11

12 Plaintiff,

13 v.

14 ALBERT RAUL FRANCO,
15

Defendant.

Case No. 2:18-cr-00356-APG-DJA-1

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Jacquelyn N.
20 Witt, Assistant Federal Public Defender, counsel for Albert Raul Franco, that the Revocation
21 Hearing currently scheduled on April 13, 2023, be vacated and continued to a date and time
22 convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

24 1. Defense counsel will be out of the jurisdiction and requires additional time to
25 discuss this matter with Mr. Franco.
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2. Defense counsel has requested discovery from Probation related to the allegations in the Petition and will need additional time to review discovery with Mr. Franco upon receipt.

3. Mr. Franco is out of custody and does not oppose the continuance.

4. The parties agree to the continuance.

This is the first request for a continuance of the revocation hearing.

DATED this 5th day of April, 2023.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Jacquelyn N. Witt
JACQUELYN N. WITT
Assistant Federal Public Defender

By /s/ Robert Knief
ROBERT KNIEF
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ALBERT RAUL FRANCO,

7 Defendant.
8

Case No. 2:18-cr-00356-APG-DJA-1

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled
11 for Thursday, April 13, 2023 at 10:00 a.m., be vacated and continued to May 24, 2023 at the
12 hour of 10:00 a.m. in Courtroom 6C; or to a time and date convenient to the court.

13 DATED this 6th day of April, 2023.

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16 UNITED STATES DISTRICT JUDGE
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